
**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

DAVITA M. KEY,)	
)	
Plaintiff,)	
)	Civil Action Number:
v.)	
)	2:19-cv-767-ECM-SMD
DYNAMIC SECURITY, INC.,)	
)	
Defendant.)	

PLAINTIFF’S PROPOSED VERDICT FORM

COMES NOW the Plaintiff and files the following proposed jury verdict form:

Do you find from a preponderance of the evidence:

1. That Davita Key engaged in protected activity?

Answer Yes or No _____

If your answer is “No,” this ends your deliberations, and your foreperson should sign and date the last page of this verdict form. If your answer is “Yes,” go to the next question.

2. That Dynamic Security, Inc. took an adverse employment action against Davita Key?

Answer Yes or No _____

If your answer is “No,” this ends your deliberations, and your foreperson should sign and date the last page of this verdict form. If your answer is “Yes,” go to the next question.

3. That Dynamic Security took the adverse employment action because of Davita Key’s protected activity?

Answer Yes or No _____

If your answer is “No,” this ends your deliberations, and your foreperson should sign and date the last page of this verdict form. If your answer is “Yes,” go to the next question.

4. That Davita Key suffered damages because of the adverse employment action?

Answer Yes or No _____

If your answer is “No,” this ends your deliberations, and your foreperson should sign and date the last page of this verdict form. If your answer is “Yes,” go to the next question.

5. That Davita Key should be awarded damages to compensate for a net loss of wages and benefits to the date of your verdict?

Answer Yes or No _____

If your answer is "Yes,"
in what amount? \$ _____

6. That Davita Key should be awarded damages to compensate for emotional pain and mental anguish?

Answer Yes or No _____

If your answer is "Yes,"
in what amount? \$ _____

If you did not award damages in response to either Question Nos. 5 or 6, this will end your deliberations, and your foreperson should go to the end of this verdict form to sign and date it. If you awarded damages in response to Question Nos. 5 or 6 (or both), go to the next question.

7. That punitive damages should be assessed against Dynamic Security, Inc.?

Answer Yes or No _____

If your answer is "Yes,"
in what amount? \$ _____

SO SAY WE ALL.

Foreperson's Signature

DATE: _____

Taken from Eleventh Circuit Pattern Instructions 4.9 and 4.22

RESPECTFULLY SUBMITTED BY
THE ATTORNEYS FOR PLAINTIFF:

/s/ Heather Newsom Leonard

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CERTIFICATE OF SERVICE

I certify that a copy of the foregoing was served on all counsel of record via the Court's electronic filing system on March 26, 2023:

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